

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

ZAKAI ZEIGLER,)
Plaintiff,)
v.) Case No. 3:25-cv-00226
NATIONAL COLLEGIATE)
ATHLETIC ASSOCIATION,)
Defendant.)

NOTICE OF CORRECTED AUTHORITY

At the hearing on June 6, 2025, counsel for the NCAA advised the Court and counsel for Mr. Zeigler of an errant quotation and citation on page 35 of his Memorandum in Support of the Motion for Preliminary Injunction (Dkt. 4). Out of an abundance of caution, undersigned counsel reviewed every citation listed in the Memorandum. Undersigned counsel files this notice of corrected authority, attaching an Amended Memorandum for Preliminary Injunction (“Amended Memorandum”) with the corrected authority incorporated.

On page 6 of the Memorandum, the Westlaw citation to *Fourqurean v. NCAA* was incorrectly listed as 2025 WL 623456. (Dkt. 4 at 6.) The correct Westlaw citation is 2025 WL 993975, which is incorporated in the Amended Memorandum. The case name, district court case number, and holding were correct.

On page 35 of the Memorandum, the Westlaw citation to *Fourqurean v. NCAA* was similarly incorrectly listed as 2025 WL 623456. (Dkt. 4 at 6.) The citation included an errant quotation that was cited to page 10 of the case, although the case ends at page 9. The Amended Memorandum removes the errant quotation marks,

modifies the citation to pages 8–9, and incorporates the correct Westlaw citation. The case name, district court case number, and holding were correct.

On page 38 of the Memorandum, the citation to *Microsoft Corp.* included an errant quotation that was cited to page 47 of the case. (Dkt. 4 at 38.) The Amended Memorandum removes the errant quotation marks and modifies the citation to a “see” citation to page 58. This amended citation is consistent with the two correct citations to *Microsoft Corp.* in the Memorandum, Dkt. 4 at 21.

Undersigned counsel apologizes to the Court and counsel for the NCAA for this errant authority, caused by human error.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2025, a true and correct copy of the foregoing has been served via the Court's CM/ECF system upon all counsel of record.

/s/ Alex Little _____